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Case No.: 2:16-mj-000215-NJK

COMPLAINT for violation of:

36 C.F.R. §4.23(a)(1) – Operating a Motor Vehicle Under the Influence of Alcohol;
36 C.F.R. §4.23(a)(2) - Operating a Motor Vehicle With a BAC of 0.08 Grams and Higher;

36 C.F.R. §4.23(a)(2) - Operating a Motor Vehicle With a BAC of 0.08 Grams and Higher;

Higher;

COUNT ONE

That on or about September 4, 2015, in the State and Federal District of Nevada, within the boundaries of the Lake Mead National Recreation Area, **KELLEY SUZANNE WILLIAMS**, defendant herein, operated a white Nissan Altima bearing Nevada registration 7HLG485 under the influence of alcohol to a degree that rendered the defendant incapable of safe operation, to wit: **KELLEY SUZANNE WILLIAMS** operated said motor vehicle along the front row of the Cottonwood Cove Trailer Village; a Ranger was flagged down by a woman later identified as K.D. who stated that a woman driving the white car threatened to “beat my ass”; K.D. pointed in the direction of the white four door sedan which the Ranger had observed

1 driving along the front row of the trailer village; the Ranger observed the vehicle turn into a
2 parking spot at trailer number 124 and observed **KELLEY SUZANNE WILLIAMS** exit from
3 the driver's seat; **KELLEY SUZANNE WILLIAMS** had a strong odor of an alcoholic
4 beverage on her breath and her eyes appeared watery and bloodshot; **KELLEY SUZANNE**
5 **WILLIAMS's** speech and balance were fair; **KELLEY SUZANNE WILLIAMS** stated that
6 she had consumed three or four 12 ounce Bud Light beers prior to driving; **KELLEY**
7 **SUZANNE WILLIAMS** performed poorly on Field Sobriety Tests; and **KELLEY SUZANNE**
8 **WILLIAMS** had "Intoxilyzer 8000" test results of 0.152 grams and 0.151 grams of alcohol per
9 210 liters of breath, respectively; all in violation of Title 36, Code of Federal Regulations,
10 Section 4.23(a)(1).

11 **COUNT TWO**

12 (Operating a Motor Vehicle with a BAC of 0.08 Grams and Higher)

13 That on or about September 4, 2015, in the State and Federal District of Nevada, within
14 the boundaries of the Lake Mead National Recreation Area, **KELLEY SUZANNE**
15 **WILLIAMS**, defendant herein, operated a white Nissan Altima bearing Nevada registration
16 7HLG485 with an alcohol concentration in the defendant's breath of 0.08 grams and more of
17 alcohol per 210 liters of breath, to wit: "Intoxilyzer 8000" test results of 0.152 grams and 0.151
18 grams of alcohol per 210 liters of breath, respectively; all in violation of Title 36, Code of
19 Federal Regulations, Section 4.23(a)(2).

20 Complainant, as and for probable cause, states the following:

21 1. Complainant is a Park Ranger with the National Park Service, Lake Mead
22 National Recreation Area, Clark County, Nevada, and has been employed as a law enforcement
23 officer for approximately eighteen years.
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1 2. The following information is the result of either complainant's own personal
2 investigation, or has been provided by other law enforcement officers:

3 (a) On September 4, 2015, National Park Service Ranger Warren Schlesinger
4 was on routine patrol within the boundaries of the Lake Mead National Recreation Area, Clark
5 County, Nevada.

6 (b) While so engaged, Ranger Schlesinger observed a white four door sedan
7 traveling along the front row of the Cottonwood Cove Trailer Village. Ranger Schlesinger was
8 then flagged down by a woman later identified as K.D. who stated that a woman driving the
9 white car threatened to "beat my ass". K.D. pointed in the direction of the white four door
10 sedan which Ranger Schlesinger had observed driving along the front row of the trailer village.
11 Ranger Schlesinger proceeded in the direction which he had observed the white sedan traveling
12 and observed the same vehicle turn into a parking spot at trailer number 124. Ranger
13 Schlesinger identified the vehicle as a white Nissan Altima bearing Nevada registration
14 7HLG485. Ranger Schlesinger observed a female exit out of the driver's seat.

15 (c) Ranger Schlesinger contacted the female to investigate the report provided
16 by K.D. The female was identified as **KELLEY SUZANNE WILLIAMS** from her valid
17 California driver's license.

18 (d) During this face to face contact with **KELLEY SUZANNE**
19 **WILLIAMS**, Ranger Schlesinger detected a strong odor of an alcoholic beverage on her breath.
20 **KELLEY SUZANNE WILLIAMS's** eyes appeared watery and bloodshot. **KELLEY**
21 **SUZANNE WILLIAMS's** speech and balance were fair. **KELLEY SUZANNE WILLIAMS**
22 stated that she had consumed three or four 12 ounce Bud Light beers prior to driving.

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(e) The following are the results of Field Sobriety Tests which were administered to **KELLEY SUZANNE WILLIAMS**:

1. Horizontal Gaze Nystagmus test - **KELLEY SUZANNE WILLIAMS** eyes lacked smooth pursuit, had distinct and sustained nystagmus at maximum deviation, and showed nystagmus prior to 45 degrees.

2. Walk and Turn test - **KELLEY SUZANNE WILLIAMS** stepped off line twice during the Instruction Phase. During the Walking Phase she stepped off line, used her arms for balance and did not turn as instructed.

3. One Leg Stand test - **KELLEY SUZANNE WILLIAMS** swayed while balancing used her arms for balance and put her foot down twice.

4. Preliminary breath test/ Alco-Sensor - **KELLEY SUZANNE WILLIAMS's** results of this test were a 0.158 percent by weight of alcohol.

(f) Based on Ranger Schlesinger's training and experience, **KELLEY SUZANNE WILLIAMS's** poor performance on the Field Sobriety Tests, and physical and objective symptoms of impairment, Ranger Schlesinger formed the opinion that **KELLEY SUZANNE WILLIAMS** had been operating a motor vehicle while under the influence of alcohol.

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1 (g) **KELLEY SUZANNE WILLIAMS** was transported to the Cottonwood
2 Cove Ranger Station where Ranger Schlesinger administered an "Intoxilyzer 8000" breath test
3 to **KELLEY SUZANNE WILLIAMS**. The results of the test were 0.152 grams, and 0.151
4 grams of alcohol per 210 liters of breath respectively.

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8 
CHRIS RAYNOLDS, Park Ranger
National Park Service
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10 SUBSCRIBED and SWORN to before me

11 this 15th day of April 2016.

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13 
14 UNITED STATES MAGISTRATE JUDGE
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